

May 7, 2015

Formal Objections to HB 4552

As a leader of a university school counselor preparation program as well as a member of the Michigan Association of Counselor Education and Supervision (MACES), I wish to express my opposition to HB 4552. In addition to the numerous serious problems posed by HB 4552 detailed below, the proposal calls for mandating two specific course requirements. Such action is not only contrary to the principles upon which higher education stands, but legislatively inappropriate, short-sighted, and impractical, particularly in that any such requirement of specific courses creates significant and long-term costs to the state. Moreover, any move to legislate course requirements for school counseling professionals would not only establish an heretofore unheard of precedent but would also open Michigan's legislative body up to a host of significant challenges. In fact, if such a bill were to pass, Michigan residents seeking to become doctors, dentists or attorneys, or work in business, engineering or liberal arts would each be vulnerable to the state imposing a specific course requirement for them. Such action would be disastrous and would carry broad implications for both individual rights and the role of government.

In addition to the serious and long-term challenges HB 4552 would pose to the state of Michigan if passed, there are several other problems directly associated with the content of the bill. These include but are not limited to the following issues:

- Passage of HB 4552 would represent a significant departure from the format of the Michigan School Code and Administrative Rules. If passed, HB 4552 would be the first legislation ever to require any single course for school counselors. School counselors are not even required to take a COURSE in school counselor preparation programs. Instead, the Michigan Department of Education (MDE) language is all about coursework, skills and content areas, which means that the required content can be embedded in courses of various titles. Specifically, the credentialing of school counselors is regulated not by the counseling licensure law (Public Act 421 of 1988) but instead by the MDE (Administrative Rules R 390.1301-R390.1308 available on-line and may be accessed via this [hyperlink](#)). Rather than requiring any specific courses, Section R 390.1305 Rule 5(a) of the administrative rules require "completion of **coursework** pursuant to section 1233(2)(b) of 1976 PA 451, MCL 380.1233(2)(b)" in order to provide a timeless flexibility for courses taught at accredited universities. Requiring "coursework" is significantly different from requiring "a course" as it disallows flexibility for universities to configure curricula and embed this content within other courses.
- The bill recommending two courses for all students in their first three years of service is unnecessary and redundant since all school counseling programs in Michigan are already required to address the content identified in the proposed bill. In order to gain approval from the Michigan Department of Education, all school counselor preparation programs must demonstrate that they address college and career readiness in every content area. Specifically, the Revised Standards for the Preparation of School Counselors

require that university programs demonstrate as of 2014/2015 how they address career and college readiness in each of the following areas:

- a. Understand the philosophy, principles, and practices of guidance services that contribute to K-12 students' academic, personal/social, and career development, including career- and college readiness.
- b. Understand the nature and range of human characteristics and appraisal methods for individual and group analysis supporting K-12 students' academic, personal/social, and career development, including career- and college readiness.
- c. Understand vocational development theory and educational/occupational information for supporting career development, including career- and college-readiness as it pertains to K-12 students.
- d. Understand counseling theory and practice as these apply to individual and group procedures, administration and coordination relationships, professional relationships, and ethics supporting K-12 students and their caregivers in students' academic, personal/social, and career development, including career- and college-readiness.
- e. Understand evaluation in the context of appropriate statistics and research methodology, follow-up evaluation, and measurement methods to implement appropriate program planning for students' academic, personal/social, and career development, including career- and college-readiness.
- f. Understand school counselor leadership skills in the school setting for the purpose of supporting K-12 students' academic, personal/social, and career development, including career- and college-readiness.
- g. Understand technology in comprehensive guidance and counseling programs to facilitate K-12 students' academic, personal/social, and career development, including career- and college-readiness.

While some programs require a course others have included coursework across the program. Students graduating from these programs would unfairly be required to take the courses because they do not have a specific course on their transcript. Additionally, the national accrediting body for school counselors (the Council on Accreditation of Counseling and Related Educational Programs) requires attention to this same content.

- Because of the bill's redundancy, its passage would also force the state to incur unnecessary and unjustified costs related to the revision of the administrative standards for school counselors and creation of a new proficiency exam. These costs would be further compounded since the administrative rules and the exam that includes assessment of this content (Appendix A) were just recently revised over a three-year process that required a tremendous amount of resources from the state. These revisions were made in part to address the concerns that prompted HB 4552.
- The proposed bill is in direct conflict with state and national credentialing requirements for school counselors since it specifically identifies a non-graduate level course when, in fact, graduate level education is required for school counselor preparation. Furthermore, there is no research that demonstrates the impact of the actions in this bill would

improve college and career readiness outcomes for 6th-12th grade students. Current best practices in the field highlight the strength of fully implemented comprehensive school counseling programs to support the college and career readiness of all students.

- Most unfortunate, the proposed bill poses a significant conflict of interest as it is being initiated by a counselor who stands to benefit financially by the passage of such a bill. This is because the course prescribed in the proposed bill is a non-graduate level course that he is presently teaching. His involvement in this proposed bill constitutes serious ethical concerns for him—something that would effect the integrity of the legislative process.
- Finally, passage of HB 4552 would be ineffective. This legislation will do nothing whatsoever to address the real barrier preventing school counselors from providing students with adequate assistance with postsecondary planning. The real barrier is the ratio of students to school counselors. The American School Counselor Association (ASCA) recommends a ratio of 250:1. In contrast, Michigan's overall ratio of students to school counselors is 706:1. It is my position that there will be no meaningful improvement in the provision of postsecondary planning services to students in Michigan high schools until this very real problem is addressed.

Overall, the proposed bill has little merit, and is in direct conflict with state and national standards related to school counseling. Moreover, the proposed bill carries serious and significant long-term financial implications to the state of Michigan—consequences that the state cannot afford.

For all of the reasons cited above, I strongly oppose this proposed bill. Instead, I would propose the members of MCAN, MACAC, MDE, MACES, and MSCA collectively collaborate to address the concerns this legislation is intended to address that are not redundant with recent revisions.

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Appendix A

From http://www.mttc.nesinc.com/PDFs/MI_field051_SG.pdf



STUDY GUIDE

TEST FOR TEACHER CERTIFICATION

051 School Counselor

Effective after October 1, 2013

MI-SG-FLD051-01

Test Objectives

As noted, the test objectives are broad, conceptual statements that reflect the knowledge, skills, and understanding an entry-level teacher needs in order to teach effectively in a Michigan classroom. Each field's list of test objectives represents the only source of information about what a specific test will cover and, therefore, should be studied carefully.

The test objectives are organized into groups known as "subareas." These subareas define the major content areas of the test. You will find a list of subareas at the beginning of the test objective list. The percentages shown in the list of subareas indicate the approximate weighting of the subareas on the test.

□II. COMPREHENSIVE SCHOOL COUNSELING PROGRAM □

004 Understand vocational, educational, and career development and planning.

Includes:

- demonstrating knowledge of major career development theories □

- applying knowledge of career and educational planning, implementation, and evaluation to ensure that all students are ready by grade 12 to transition to postsecondary education and/or careers □
- demonstrating knowledge of strategies for connecting postsecondary goals (e.g., career, college, military, vocational training, employment, school-to-work transitions) to students' academic preparation and aspirations □
- demonstrating knowledge of how to use technology to facilitate career development and exploration activities with students □
- applying knowledge of the role of diversity and equity issues as they relate to educational and career planning □
- applying knowledge of strategies for helping students explore, research, plan, and select postsecondary options □
- applying knowledge of tools, resources, and methods associated with career and educational planning (e.g., interest inventories, personality inventories, skills assessments) and strategies for helping students select curricula and coursework that support their achievement of future goals □
- demonstrating knowledge of how to promote families' early understanding of the interrelationship between the academic process and students' future success □
- demonstrating knowledge of how to use technology to identify, access, collect, and analyze data related to the effectiveness of the career development program in promoting students' college and career readiness □